IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF TEXAS

LAREDO DIVISION

UNITED STATES OF AMERICA	§	
	§	CR. NO. L-15-1499
CHRISTOPHER MINNICK	§	

UNOPPOSED MOTION TO MODIFY BOND

The Defendant, CHRISTOPHER MINNICK, by and through his attorney of record, MARJORIE A. MEYERS, Federal Public Defender, by JOHN S. PAUL, Assistant Federal Public Defender, Laredo, Texas, files this Unopposed Motion to Modify Bond and in support thereof, shows the Court the following:

I.

On October 30, 2015, CHRISTOPHER MINNICK was arrested by Federal agents and charged with assaulting, resisting, or impeding a federal officer in violation of Title 18 U.S.C. § 111(a)(1). On November 2, 2015, United States Magistrate Judge Diana Song Quiroga appointed the Federal Public Defender to represent Defendant.

II.

On November 6, 2015, the Court set a $25,000 unsecured bond with travel restricted to the continental United States for work purposes only. Defendant was required to seek employment, report law enforcement contacts, and refrain from possessing firearms, destructive devices, and other dangerous weapons. Travel to Mexico was prohibited.

On January 4, 2016, Defendant filed a Motion to Dismiss Criminal Information. On September 16, 2016, the Court granted Defendant's Motion to Dismiss Criminal Information in

United States v. Nicanor Marquez, L-15-778, a case with identical issues to those raised in the Motion to Dismiss Criminal Information in this case. The Government has appealed the dismissal of the information in the case of Nicanor Marquez.

Mr. Minnick has been released on bond since November 10, 2015. Since his release, Mr. Minnick has been in compliance with his conditions of release. Mr. Minnick is not a violent offender or substance abuser. Minnick is not a flight risk. He has been constantly employed since his arrest. He is charged with a misdemeanor.

Undersigned counsel believes that the Court will make the same ruling in this case as in the case of Nicanor Marquez. Undersigned counsel believes the Government will elect to appeal the Court's ruling, if it is adverse. There is no telling how long the appeal process may take. Mr. Minnick has had his travel restricted for nearly one year.

Thus, Defendant respectfully requests that the Court modify his conditions of bond to:

(1) delete the travel restrictions;

(2) delete any requirement that he regularly report to pretrial services, and that he be required only to report changes in address, employment, or telephone number; and

(3) delete the requirement that Defendant refrain from possessing firearms.

III.

Counsel contacted the Assistant United States Attorney assigned to the case, Alfredo de la Rosa, regarding this motion, and he is unopposed.

Respectfully submitted,

MARJORIE A. MEYERS
Federal Public Defender
Southern District of Texas
Southern District of Texas No. 3233
Texas State Bar No. 14003750

By /s JOHN S. PAUL
JOHN S. PAUL
Assistant Federal Public Defender
Attorney-in-Charge
Texas State Bar Number 00791413
Southern District of Texas No. 33158
1202 Houston St.
Laredo, Texas 78040
Telephone: (956)753-5313
Fax: (956)753-5317

CERTIFICATE OF SERVICE

I, JOHN S. PAUL certify that on **November 4, 2016**, a copy of the foregoing motion was served by Notification of Electronic Filing to the office of the Assistant United States Attorney. Additionally, a copy was sent via facsimile to the Office of Pretrial Services in Laredo, Texas

s/ John S. Paul
John S. Paul
Assistant Federal Public Defender